## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA

LARRY G. PHILPOT,	Case No. 3:15-cv-00145 JD-CAN
Plaintiff,	
<b>v.</b>	) )
GRAY TELEVISION, INC.,	<ul><li>Judge Jon E. DeGuilio</li><li>Magistrate Judge Christopher A.</li></ul>
Defendant.	Nuechterlein
GRAY TELEVISION GROUP, INC.,	) )
Third-Party Plaintiff,	) ) )
v.	, ) )
MULTIMEDIA GRAPHIC NETWORK,	, )
INC. d/b/a MGN Online,	, ) )
Third-Party Defendant.	, )

# **NOTICE OF MOTION**

TO: ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, on November 25, 2015, Gray Television Group, Inc. filed its Unopposed Motion for Entry of Agreed Protective Order, a copy of which is hereby served upon you. As set forth in Local Rule 7.1, any party in opposition to such motion has fourteen (14) days after service to file an objection.

GRAY TELEVISION GROUP, INC.

By: /s/ Robert J. Labate
One of Its Attorneys

Michael P. O'Neil Taft Stettinius & Hollister LLP

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LARRY G. PHILPOT,  Plaintiff,	) Case No. 3:15-cv-00145 JD-CAN
v.	) )
GRAY TELEVISION, INC.,	<ul> <li>Judge Jon E. DeGuilio</li> <li>Magistrate Judge Christopher A.</li> </ul>
Defendant.	) Nuechterlein
GRAY TELEVISION GROUP, INC.,	) )
Third-Party Plaintiff,	) )
v.	) )
MULTIMEDIA GRAPHIC NETWORK,	)
INC. d/b/a MGN Online,	, ) )
Third-Party Defendant.	, )

## UNOPPOSED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

NOW COMES Defendant, Gray Television Group, Inc. ("**Defendant**"), and files this Unopposed Motion, pursuant to Federal Rule of Civil Procedure 26(c), for entry of an Agreed Protective Order signed by counsel for Defendant, Larry G. Philpot and Multimedia Graphic Network, Inc. (the "**Parties**") to protect against the dissemination of confidential materials and information in the above-captioned case. In support thereof, Gray respectfully states:

1. The Parties regard certain information to be exchanged during discovery to be confidential, sensitive, or otherwise to be protected from public dissemination, and

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therefore request this Court enter the attached agreed protective order (Exhibit 1) setting

forth the procedure for the use and limited dissemination of confidential information and

materials.

WHEREFORE, Gray Television Group, Inc. requests that this Court enter the

attached agreed protective order, and grant any other relief the Court deems necessary and

proper.

DATE: November 25, 2015

Respectfully submitted,

GRAY TELEVISION GROUP, INC.

By: /s/ Robert J. Labate

One of Its Attorneys

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#### **CERTIFICATE OF SERVICE**

I, an attorney, certify under penalty of perjury that on November 25, 2015 a copy of the foregoing Gray Television Group, Inc.'s Motion to Extend Discovery Deadlines was served upon all counsel of record consenting to service through this Courts CM/ECF system:

#### Jacob R Cox

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/s/ Richard A. Bixter, Jr.